

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MAYA PYSKATY,

Plaintiff,

- against -

WIDE WORLD OF CARS, LLC d/b/a WIDE  
WORLD BMW; BMW BANK OF NORTH  
AMERICA,

Defendants.

Civil Action No.:  
15-CV-1600 (JCM)

**DEFENDANT BMW BANK  
OF NORTH AMERICA'S  
PROPOSED VOIR DIRE QUESTIONS**

Defendant BMW BANK OF NORTH AMERICA respectfully requests that the following questions be asked of all potential jurors during *voir dire*, by the Court:

**Background Questions:**

1. Where do you live? How long have you lived there?
2. Are you employed? If so, what is your occupation and how long have you held it? If retired, what was your occupation?
3. Are you married, divorced, separated or single?
4. Does your spouse work, if so what type of job does your spouse hold? If retired, what was your spouse's occupation.
5. Do you have children? If so, what are their ages and are they employed?
6. What is your highest level of education?

**Prior Court Experience:**

1. Have you ever served on a jury? If so, was it civil or criminal? Without disclosing the verdict, did you reach a verdict? Was there anything about your prior jury experience which would make it difficult for you to sit as an impartial juror in this case?

2. Have you or your family member ever been involved in a civil lawsuit?
  - a. If so, were you or your family member a plaintiff or defendant in the lawsuit?
  - b. What was the nature of the lawsuit?
  - c. Were you satisfied with the process/outcome?
3. Have you or your family member ever been a witness in court? If so, under what circumstances?
4. What is your understanding of what the role of juror is?

**Specific Questions:**

1. Do you drive?
2. Have you or your spouse ever owned or leased a car?
  - a. If you or your spouse purchased a car, was it financed? By whom?
  - b. If the car was leased, which bank was it leased from?
  - c. How satisfied were you or your spouse with the purchase and/or the lease?
  - d. Have you or your spouse ever missed payments on a loan or lease?
3. Have you or your family member owned or leased a BMW vehicle?
4. Do you have an impression on the following? If so, what is it?
  - a. BMW vehicles;
  - b. BMW owners;
  - c. BMW dealerships; and
  - d. BMW financial services
5. Have you ever worked for an automobile dealer or service center? If so, provide details.
6. Have you or your spouse ever financed from a bank to purchase or lease something other than a car?
  - a. If yes, which bank did you or your spouse finance and/or lease from?
  - b. How satisfied were you or your spouse with the purchase and/or the lease?
  - c. Have you or your spouse ever missed payments on a loan or lease?

7. Do you have an impression that banks are trustworthy?
8. Do you have any strong feeling towards banks in general?
9. If Ms. Pyskaty does not prove her case, will you be able to turn her away and find for the Defendants?

Dated: New York, New York  
May 9, 2019

BIEDERMANN HOENIG SEMPREVIVO,  
A Professional Corporation

By: /s/  
Joseph Kim, Esq.

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To: All counsel of record  
(Via ECF)